

## Remarks

Applicants respectfully request reconsideration of this application as amended.

Claims 1, 4, 7, 11, 12, 18 and 24 have been amended. No claims have been cancelled or added. Therefore, claims 1-26 are presented for examination.

Claims 1, 3-20, and 22-26 stand rejected under 35 U.S.C. §102(e) as being anticipated by Tsumagari et al. (U.S. Patent No. 6,480,669). Applicants submit that the present claims are patentable over Tsumagari.

Tsumagari discloses an apparatus/method to allow a user to write or erase a mark (entry point) at an arbitrary recording position of video data, audio data, and the like as if he or she placed a bookmark between pages or at an important position while reading a book. A digital video information medium is included that has a volume space including a management area and data area. The data area stores data segmented into one or more objects (RTR\_MOV.VRO/VR\_MOVIE.VRO, RTR\_STO.VRO/VR\_STILL.VRO, RTR\_STA.VRO/VR\_AUDIO.VRO). Each object is comprised of one or more data units (one or more VOBUs form a cell, and one or more cells form video object). Each data unit (VOBU) stores one or more packs (video or audio packs) of video or audio data to be played back within a predetermined time (0.4 to 1.2 sec). The management area stores management information (RTR\_VMG) used to manage the objects. The management information (RTR\_VMG) has program chain information (ORG\_PGCIT or UD\_PGCIT) for designating the playback order of objects.

Further, a digital video information recording/playback apparatus records or plays back the contents of the objects (RTR\_MOV.VRO/VR\_MOVIE.VRO) using a recordable/reproducible medium which has movie cell information (M\_CI) in management

information (RTR\_VMG) for managing objects (RTR.sub.13 MOV.VRO/VR\_MOVIE.VRO) as recorded information. The digital video information recording/playback apparatus comprises an entry point setting unit (MPU) for setting a required entry point (M\_C\_EPI#1 to M\_C\_EPI#n) in the movie cell information (M\_CI); an additional information input unit (MPU) for inputting additional information (information type, information date, text information, and the like in PRM\_TXTI) with respect to the entry point (M\_C\_EPI); and an additional information setting unit (MPU) for setting the additional information in the entry point (M\_C\_EPI). In addition, a digital video information processing method records or plays back the contents of the objects (RTR\_MOV.VRO/VR\_MOVIE.VRO) using a recordable/reproducible medium which has movie cell information (M\_CI) in management information (RTR\_VMG) for managing objects (RTR\_MOV.VRO/VR\_MOVIE.VRO) as recorded information. Using the entry point as needed, the user can easily recognize the recorded contents of a disc. Also, using the entry point information, the user can record/play back from a desired position. See Tsumagari at col. Col. 1, ll. 59 – col. 2, ll. 66.

Claim 1 of the present application recites storing a first component of information on the identified packets in an Extensible Markup Language (XML) file and storing a second component of information on the identified packets in a binary file. Applicants submit that nowhere in Tsumagari is there disclosed such a process. Thus, claim 1 is patentable over Tsumagari.

Claims 2-6 depend from claim 1 and include additional features. Therefore, claims 2-6 are also patentable over Tsumagari.

Claim 7 recites retrieving a first component of information on specified packets in an MPEG stream from an Extensible Markup Language (XML) navigation file that is separate from the MPEG stream and retrieving a second component of information from a binary navigation file that is separate from the MPEG stream. For the reasons described above with respect to claim 1, claim 7 is also patentable over Tsumagari. Since claims 8-11 depend from claim 7 and include additional features, claims 8-11 are also patentable over Tsumagari.

Claim 12 recites storing a first component of information on the identified packets in an Extensible Markup Language (XML) file and storing a second component of information on the identified packets in a binary file. Thus, for the reasons described above with respect to claim 1, claim 12 is also patentable over Tsumagari. Because claims 13-17 depend from claim 12 and include additional features, claims 13-17 are also patentable over Tsumagari.

Claim 18 recites an authoring tool coupled to the medium to examine the MPEG stream and to produce a first component of navigation information stored in an Extensible Markup Language (XML) navigation file and a second component of information stored in a binary navigation file separate from the MPEG stream. Therefore, for the reasons described above with respect to claim 1, claim 18 is also patentable over Tsumagari. Because claims 19-23 depend from claim 18 and include additional features, claims 19-23 are also patentable over Tsumagari.

Claim 24 recites store a navigation generator to store a first component of the navigation information in an Extensible Markup Language (XML) navigation file and a second component of information stored in a binary navigation file separate from a file to store the MPEG stream. Thus, for the reasons described above with respect to claim 1, claim

24 is also patentable over Tsumagari. Since claims 25 and 26 depend from claim 24 and include additional features, claims 25 and 26 are also patentable over Tsumagari.

Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Tsumagari in view of Acampora et al. (U.S. Patent No. 5,168,356). Applicants submit that the present claims are patentable over Tsumagari even in view of Acampora.

Acampora discloses a video signal encoding system that includes an apparatus for segmenting encoded video data into transport blocks for signal transmission. The transport block format enhances signal recovery at the receiver by virtue of providing header data from which a receiver can determine re-entry points into the data stream on the occurrence of a loss or corruption of transmitted data. The number of re-entry points is maximized by providing secondary transport headers embedded within encoded video data in respective transport blocks. See Acampora at Abstract.

Nonetheless, Acampora does not disclose or suggest storing or retrieving a first component of information on the identified packets in an Extensible Markup Language (XML) file and storing a second component of information on the identified packets in a binary file. As discussed above, Tsumagari does not disclose or suggest such features. Therefore, any combination of Tsumagari and Acampora would also not disclose or suggest the features. As a result, the present claims are patentable over Tsumagari in view of Acampora.

Claim 21 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Tsumagari in view of Taniguchi et al. (U.S. Patent No. 6,192,183). Applicant submits that the present claims are patentable over Tsumagari even in view of Taniguchi.

Taniguchi discloses a video editing scheme for enabling a video editing operation on the coded video data efficiently. In a system in which the coded video data are decoded and displayed on a video display device, events including scene changes are detected from the coded video data, and icons are produced from the coded video data in correspondence to the detected events. On the other hand, playback possible positions from which the coded video data can be played back smoothly are determined, and an index information including an information on the produced icons and the determined playback possible positions is managed. Then, a plurality of icons are displayed on a single display, and a user is allowed to specify a desired icon among the displayed icons on the single display. Then, one playback possible position corresponding to the desired icon specified by the user is obtained according to the managed index information, and the coded video data are supplied to the video display device starting from the obtained playback possible position. See Taniguchi at Abstract.

However, Taniguchi does not disclose or suggest storing or retrieving a first component of information on the identified packets in an Extensible Markup Language (XML) file and storing a second component of information on the identified packets in a binary file. As discussed above, Tsumagari does not disclose or suggest such features. Therefore, any combination of Tsumagari and Acampora would also not disclose or suggest the features. As a result, the present claims are patentable over Tsumagari in view of Taniguchi.

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.


The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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Date: February 6, 2006

  
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